

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

JOSE MONTES OPICO,

Plaintiff,

v.

CONVERGENT OUTSOURCING, INC.,

Defendant.

Case No. 2:18-cv-01579-RSL

**SECOND JOINT STIPULATION TO  
CONTINUE TRIAL AND RELATED  
DEADLINES**

NOTE FOR MOTION DOCKET:  
March 3, 2020

Plaintiff Jose Montes Opico ("Plaintiff") and Defendant Convergent Outsourcing, Inc. ("Defendant"), through their respective counsel of record, hereby stipulate and jointly move the Court to amend the Amended order Setting Trial and Related Dates (Dkt #40), entered on November 14, 2019 based on the following stipulation:

WHEREAS, Plaintiff and Defendant each have cross-motions for summary judgment pending (Dkt. #25 and #34);

WHEREAS, trial in this action is currently set for May 4, 2020;

WHEREAS, the pre-trial deadlines are approaching in April 2020;

WHEREAS, the parties anticipate that the Court's ruling on the cross-motions for summary judgment will narrow the issues in this case, and may dispose of this case in its

SECOND JOINT STIPULATION  
TO CONTINUE TRIAL AND  
RELATED DEADLINES - 1  
Case No. 2:18-cv-01579-RSL

Donald G. Grant, P.S.  
Attorneys and Counselors at Law  
Washougal Town Square, Ste 245  
1700 Main Street  
Washougal, WA 98671  
TEL: (360) 694-8488  
FAX: (360) 694-8688  
E-MAIL: don@dongrantps.com

entirety;

WHEREAS, the parties mutually agree that postponing trial and all pre-trial deadlines until after the Court rules on the parties' cross-motions for summary judgment will conserve the resources of the parties and the Court;

WHEREFORE, it is hereby stipulated and agreed by the parties that trial and the accompanying deadlines be continued as follows:

<u>Matter</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
All motions in limine must be filed by and noted on the motion calendar no earlier than the second Friday thereafter. Replies will be accepted.	April 6, 2020	July 7, 2020
Agreed pretrial order due	April 22, 2020	July 24, 2020
Trial briefs and trial exhibits due	April 29, 2020	July 28, 2020
Trial Date	May 4, 2020	August 3, 2020

[SIGNATURE PAGE FOLLOWS]

1 IT IS SO STIPULATED.

2 DATED: March 3, 2020

3 DONALD G. GRANT, P.S.

4 /s/ Donald G. Grant

5 DONALD G. GRANT, WSBA#15480  
6 Of Counsel for Defendant Convergent  
7 Outsourcing, Inc.

8 DONALD G. GRANT, P.S.

9 Attorneys and Counselors at Law  
10 Washougal Town Square, Suite 245  
11 1700 Main Street  
12 Washougal, WA 98671  
13 TEL: (360) 694-8488  
14 CELL: (360) 907-3094  
15 FAX: (360) 694-8688  
16 E-MAIL: don@dongrantps.com

17 DATED: March 3, 2020

18 ANDERSON SANTIAGO, PLLC

19 /s/ Jason D. Anderson

20 JASON D. ANDERSON, WSBA#38014  
21 Attorneys for Plaintiff Jose Montes Opico

22 ANDERSON SANTIAGO, PLLC

23 787 Maynard Ave. S  
24 Seattle, WA 98104  
25 TEL: (206) 395-2665  
26 FAX: (206) 395-2719  
27 E-MAIL: jason@alkc.net

28  
SECOND JOINT STIPULATION  
TO CONTINUE TRIAL AND  
RELATED DEADLINES - 3  
Case No. 2:18-cv-01579-RSL

Donald G. Grant, P.S.  
Attorneys and Counselors at Law  
Washougal Town Square, Ste 245  
1700 Main Street  
Washougal, WA 98671  
TEL: (360) 694-8488  
FAX: (360) 694-8688  
E-MAIL: don@dongrantps.com


**PROPOSED ORDER**

Upon consideration of the stipulation submitted by the parties and good cause appearing therefor, the Court orders that the Scheduling Order is amended as follows:

<b><u>Matter</u></b>	<b><u>Current Deadline</u></b>	<b><u>Proposed Deadline</u></b>
All motions in limine must be filed by and noted on the motion calendar no earlier than the second Friday thereafter. Replies will be accepted.	April 6, 2020	July 7, 2020
Agreed pretrial order due	April 22, 2020	July 24, 2020
Trial briefs and trial exhibits due	April 29, 2020	July 28, 2020
Trial Date	May 4, 2020	August 3, 2020

**IT IS SO ORDERED.**

DATED: March 6, 2020

  
The Hon. Robert S. Lasnik

SECOND JOINT STIPULATION  
TO CONTINUE TRIAL AND  
RELATED DEADLINES - 4  
Case No. 2:18-cv-01579-RSL

Donald G. Grant, P.S.  
Attorneys and Counselors at Law  
Washougal Town Square, Ste 245  
1700 Main Street  
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TEL: (360) 694-8488  
FAX: (360) 694-8688  
E-MAIL: don@dongrantps.com